## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

VS. \* TDC 20-00033

WILLIAM GARFIELD BILBROUGH IV \*

## MOTION TO SEAL DEFENDANT'S MOTION TO REVIEW DETENTION ORDER AND EXHIBITS IN SUPPORT THEREOF AND TO SET CONDITIONS OF RELEASE

The Defendant, by and through his attorney, Robert C. Bonsib, Esq., and the law office of MarcusBonsib, LLC, hereby requests that this Honorable Court grant the Defendant's Motion to Seal the Defendant's Motion to Review Detention Order and Exhibits In Support Thereof and To Set Conditions of Release, as reasons in furtherance thereof, states as follows:

- 1. The Defendant has filed a Motion to Review Detention Order and Exhibits in Support
  Thereof and to Set Conditions of Release that includes personal information of a type
  and nature that is not appropriate for public disclosure including, but not limited to, a
  mental/medical health information.
  - 2. The Defendant is respectfully requesting that this Honorable Court order that the Defendant's Motion To Vacate Detention Order and Exhibits In Support Thereof and to Set Conditions of Release be sealed.

WHEREFORE, the Defendant respectfully requests that this Honorable Court grant the relief prayed.

Respectfully submitted,

/s/ Robert C. Bonsib

ROBERT C. BONSIB 6411 Ivy Lane, Suite 116 Greenbelt, Maryland 20770 (301) 441-3000 robertbonsib@marcusbonsib.com Trial Bar No. 00324

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing motion was filed, via ECF, this 12th day of January, 2020 to all parties of record

/s/ Robert C. Bonsib

ROBERT C. BONSIB